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Hon. John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

March 2, 2021

Re: U.S. v. De La Rosa
20 Cr. 537 (JPC)

Dear Judge Cronan:

I write to respectfully request that the Court allow counsel additional time to submit objections to the draft Pre-sentence Report (“PSR”), and to allow Probation additional time to file its final PSR, which, pursuant to the original sentencing schedule, is currently due in the coming weeks. The government consents to this application.

While sentencing in this case was originally set for March 25, 2021, your Honor recently granted our request for a 90-day adjournment of sentencing in this matter, which is now set for the week of June 21, 2021. Mr. De La Rosa a native Spanish speaker with limited grasp of English. Under normal circumstances, I would visit the jail with an interpreter and ask the interpreter to translate the PSR orally, a process that can take hours. As video and telephone conferences with our clients are limited in duration, during the COVID-19 pandemic, my practice has been to seek approval for the translation of the PSR in to Spanish in advance, send the translation to my client, and review it via video or teleconference with the assistance of an interpreter. Because translation of the PSR takes time, it is not often possible to provide objections or corrections to Probation within the 14-day comment period anticipated by Rule 32(f)(1) of the Federal Rules of Criminal Procedure.

I received the draft PSR on February 19, 2021, which makes my objections due on March 5, 2021. As I am still waiting for the translation of the PSR, I asked Probation for additional time to file my objections. I was told that in order to accommodate my request, Probation needed the Court to move its deadline for the filing of the final PSR. Given that Mr. De La Rosa’s sentence has been adjourned until June, and to allow time for Mr. De La Rosa to review the draft report and for counsel to prepare any objections or corrections, I respectfully ask the Court to permit counsel additional time to prepare objections and to permit Probation to file its final report closer to the June 21, 2021 date.

Thank you for your kind consideration of this request.

Defendant De La Rosa's request is granted. The deadline to file the final Presentence Report is adjourned to May 31, 2021.

SO ORDERED.

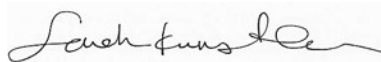
Date: March 2, 2021

New York, New York



JOHN P. CRONAN
United States District Judge

Respectfully submitted,



Sarah Kunstler
Attorney for Mario De La Rosa

CC: AUSA Marguerite Colson